

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

December 6, 2004

John T. Dunn Interim Chief Engineer/Deputy General Manager District of Columbia Water and Sewer Authority 5000 Overlook Ave, SW Washington DC 20032

Re: Post Partial Lead Service Line Replacement Sampling Plan

Dear Mr. Dunn,

Thank you for your letters of August 20 and November 24, 2004 in response to U.S. Environmental Protection Agency Region III's ("EPA") comments and concerns about the District of Columbia Water and Sewer Authority's ("WASA") Post Partial Lead Service Line Replacement Sampling Plan. The plan is intended to comply with paragraph 67 of the Administrative Order for Compliance on Consent (SDWA 03-2004-0259-DS) ("Order"), which directed WASA to submit for EPA's review and approval a plan to obtain follow up sampling pursuant to 40 CFR 141.84(d) after partial replacement of a lead service line.

During a December 2, 2004 call, EPA received clarification on a number of data reporting issues. WASA has agreed to provide an electronic report that will include year-to-date information of the replacement year's partial replacements and post-replacement sampling. This report will be submitted with the monthly reports that WASA is already submitting. The purpose of the additional report is to provide a more complete picture of the sampling rate as it relates to replacements. Further, WASA will clarify the notations in the monthly reports that apply to "partial-partial" replacements.

After considering WASA's written and oral responses to EPA's comments and questions, EPA approves of the plan submitted by WASA in accordance with Paragraph 67. EPA appreciates WASA's efforts to provide reports that accurately reflect the scope and success of the replacement program. Please contact me at 215-814-5445 if you have any questions.

Sincerely,

Karen D. Johnson, Chief

Karen D. John

Safe Drinking Water Act Branch

cc: Avis Russell, Esq.